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LONG ISLAND OFFICE

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F. #2024R00022

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

- against -

PARAS CHAUHAN,

Defendant.
----- X

INDICTMENT

CR25 97
Cr. No.

(T. 18, U.S.C., §§ 981(a)(1)(C), 982(a)(1),
982(b)(1), 1349, 1956(h) and 3551 et
seq.; T. 21, U.S.C., § 853(p); T. 28,
U.S.C., § 2461(c))

CHOUDHURY, J.
TISCIONE, M.J.

THE GRAND JURY CHARGES:

INTRODUCTION

At all times relevant to this Indictment, unless otherwise indicated:

I. The Defendant, Co-Conspirators and Relevant Entities

1. The defendant PARAS CHAUHAN was a citizen and resident of India.

CHAUHAN controlled various business entities, including Expert Technical Services ("Expert Technical") and Expert Universal LLC ("Expert Universal"), which were each incorporated in India.

2. Co-Conspirator 1 ("CC-1"), an individual whose identity is known to the Grand Jury, was a citizen of India and a resident of New York. CC-1 controlled Sabharwal Consulting LLC ("Sabharwal Consulting"), an entity incorporated in New York.

3. Co-Conspirator 2 ("CC-2"), an individual whose identity is known to the Grand Jury, was a citizen of India and a resident of New York. CC-2 controlled Unicorn Crafts LLC ("Unicorn Crafts"), an entity incorporated in New York.

II. The Fraudulent Scheme

4. Between approximately September 2018 and October 2024, the defendant PARAS CHAUHAN, together with others, engaged in a scheme to defraud numerous victims located throughout the United States through a series of computer technical support (“tech support”) scams, including Victims-1 through -7, individuals whose identities are known to the Grand Jury. A tech support scam is a type of online financial fraud that occurs when an individual user of a computer connected to an Internet browser receives an unsolicited pop-up alert or warning message that appears on the computer screen, often claiming that the computer is infected with a virus or needs immediate attention. In a typical tech support scam, the scammer will ask the individual to call a phone number for technical assistance; download or update computer software; or click a link that leads to malicious content. The scammer uses a fake persona as a computer software technician affiliated with the security center of a reputable technology or computer company, in order to gain the trust of the targeted victim, convince the victim that his or her computer has been hacked or is infected with a virus, and trick him or her into sending money to the scammer under false pretenses.

5. In approximately September 2018, Victim-1, a resident of New York, was the victim of a tech support scam that was conducted through a series of communications with an unknown individual over the internet who made numerous misrepresentations to Victim-1 in order to defraud Victim-1 of money. On approximately September 18, 2018, Victim-1 mailed a personal check in the amount of approximately \$2,800, made payable to Unicorn Crafts, to CC-2 at a mailing address in Old Westbury, New York. On approximately September 20, 2018, the defendant PARAS CHAUHAN directed CC-2 to deposit Victim-1’s check into a Unicorn Crafts bank account (the “Unicorn Crafts Bank Account”).

6. In approximately July 2022, Victim-2, a resident of Pennsylvania, was the victim of a tech support scam that was conducted through a series of communications with an unknown individual over the internet who made numerous misrepresentations to Victim-2 in order to defraud Victim-2 of money. Between approximately July 15, 2022 and July 22, 2022, Victim-2 sent two bank checks, made payable to Expert Universal, each totaling approximately \$50,000, via Federal Express. The checks from Victim-2 were deposited into an Expert Universal bank account, in Queens, New York, which was controlled by the defendant PARAS CHAUHAN.

7. Between approximately February and March 2023, Victim-3, a resident of Michigan, was the victim of a tech support scam that was conducted through a series of communications with an unknown individual over the internet who made numerous misrepresentations to Victim-3 in order to defraud Victim-3 of money. On or about February 2, 2023, Victim-3 mailed a personal check in the amount of approximately \$48,000, made payable to Sabharwal Consulting Corp., to CC-1 at a mailing address in New Hyde Park, New York. On or about February 7, 2023, CC-1 deposited Victim-3's check into a Sabharwal Consulting bank account, in New Hyde Park, New York (the "Sabharwal Consulting Bank Account"). On approximately February 27, 2023, CC-1 sent a wire transfer totaling approximately \$44,000, the bulk of which was Victim-3's money, from the Sabharwal Consulting Bank Account to an Expert Technical bank account (the "Expert Technical Bank Account") in India, which was controlled by the defendant PARAS CHAUHAN.

8. On approximately March 8, 2023, Victim-3 mailed a cashier's check in the amount of approximately \$48,000, made payable to Unicorn Crafts, to CC-2 at a mailing address in Old Westbury, New York. On or about March 9, 2023, CC-2 deposited Victim-3's

check into the Unicorn Crafts Bank Account, in Old Westbury, New York. Between approximately March 16, 2023 and March 17, 2023, CC-2 sent a two wire transfers, totaling approximately \$42,000, representing the bulk of Victim-3's money, from the Unicorn Crafts Bank Account to a bank account in India, which was controlled by an associate of the defendant PARAS CHAUHAN.

9. In approximately March 2023, Victim-4, a resident of Indiana, was the victim of a tech support scam that was conducted through a series of communications with an unknown individual over the internet who made numerous misrepresentations to Victim-4 in order to defraud Victim-4 of money. On or about March 16, 2023, Victim-4 mailed a cashier's check in the amount of approximately \$99,000, made payable to Sabharwal Consulting, to CC-1 at a mailing address in New Hyde Park, New York, via UPS. On or about March 17, 2023, CC-1 deposited the cashier's check into the Sabharwal Consulting Bank Account in New Hyde Park, New York. On or about March 27, 2023, CC-1 wired approximately \$49,000 from the Sabharwal Consulting Bank Account to the Expert Technical Bank Account in India, which was controlled by the defendant PARAS CHAUHAN.

10. Between approximately March 2023 and April 2023, Victim-5 and Victim-6, both residents of Arizona, were the victims of a tech support scam that was conducted through a series of communications with an unknown individual over the internet who made numerous misrepresentations to Victim-5 and Victim-6 in order to defraud them of money. On approximately March 20, 2023, Victim-5 sent a check for approximately \$33,000 from an account belonging to Victim-5 and Victim-6, made payable to Unicorn Crafts at a mailing address in Old Westbury, New York. On approximately March 22, 2023, CC-2 deposited Victim-5's check into the Unicorn Crafts Bank Account in Old Westbury, New York. Between

approximately March 28, 2023 and March 31, 2023, CC-2 sent two wire transfers, totaling approximately \$30,000, representing the bulk of Victim-5 and Victim-6's money, from the Unicorn Crafts Bank Account to the Expert Technical Bank Account in India, which was controlled by the defendant PARAS CHAUHAN.

11. In approximately October 2024, Victim-7, a resident of Massachusetts, was the victim of a tech support scam that was conducted through a series of communications with an unknown individual over the internet and telephone who made numerous misrepresentations to Victim-7 in order to defraud Victim-7 of money. On approximately October 7, 2024, Victim-7 mailed a cashier's check, in the amount of approximately \$5,500, via UPS, to Sabharwal Consulting, at an address in Plainview, New York, at the direction of defendant PARAS CHAUHAN, which funds were expected to be wired to an account controlled by CHAUHAN. Law enforcement intercepted Victim-7's payment.

12. Proceeds from the fraud scheme were deposited into various bank accounts controlled by the defendant PARAS CHAUHAN, CC-1 and CC-2, at the direction of defendant PARAS CHAUHAN, in a manner designed to conceal the source of the funds and the ultimate recipients. CHAUHAN's scheme has resulted in identified financial losses of approximately \$4 million.

COUNT ONE

(Conspiracy to Commit Mail and Wire Fraud)

13. The allegations contained in paragraphs one through 12 are realleged and incorporated as if fully set forth in this paragraph.

14. In or about and between September 2018 and October 2024, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the

defendant PARAS CHAUHAN, together with others, did knowingly and intentionally conspire to:

(a) devise a scheme and artifice to defraud victims of a tech support scheme, and to obtain money and property from them by means of materially false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice, cause mail matter to be delivered by main and private and commercial interstate carriers, according to the directions thereon, contrary to Title 18, United States Code, Section 1341; and

(b) devise a scheme and artifice to defraud victims of a tech support scheme, and to obtain money and property from them by means of materially false and fraudulent pretenses, representations and promises, and for purposes of executing such scheme and artifice, transmit and cause to be transmitted, by means or wire communication in interstate and foreign commerce, writing, signs, signals, pictures and sounds, contrary to Title 18, United States Code, Section 1343.

(Title 18, United States Code, Sections 1349 and 3551 et seq.)

COUNT TWO
(Conspiracy to Commit Money Laundering)

15. The allegations contained in paragraphs one through 12 are realleged and incorporated as if fully set forth in this paragraph.

16. In or about and between September 2018 and October 2024, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant PARAS CHAUHAN, together with others, did knowingly and intentionally conspire to:

(a) conduct one or more financial transactions, to wit: wire transfers of money, which transactions in fact involved the proceeds of specified unlawful activity, to wit: mail fraud and wire fraud, in violation of Title 18, United States Code, Sections 1341 and 1343, knowing that property involved in the financial transactions represented the proceeds of some form of unlawful activity and that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of specified unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(1)(B)(i); and

(b) transport, transmit and transfer monetary instruments and funds from a place in the United States to and through a place outside the United States, knowing that that the monetary instruments and funds involved in the transportation, transmission, or transfer represented the proceeds of some form of unlawful activity and that the transportation, transmission, or transfer was designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of specified unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(2)(B)(i).

(Title 18, United States Code, Sections 1956(h) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNT ONE

17. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged in Count One, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offense to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense.

18. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be

divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNT TWO

19. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged in Count Two, the government will seek forfeiture in accordance with Title 18, United States Code, Section 982(a)(1), which requires any person convicted of such offense to forfeit any property, real or personal, involved in such offense, or any property traceable to such property.

20. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;

- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be

divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 982(a)(1) and 982(b)(1); Title 21, United States Code, Section 853(p))

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| A TRUE BILL

FOREPERSON

By David Pittluck, Assistant U.S. Attorney
JOHN J. DURHAM
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK